

## **REMARKS/ARGUMENTS**

### **1.) Claim Rejections – 35 U.S.C. §102(e)**

The Examiner rejected claims 1, 4-6, 8-12, 15-17 and 19-22 as being anticipated by Cohen, *et al.* (US 6,389,462 B1). The Applicants traverse the rejections.

Anticipation requires that the disclosure of a single piece of prior art reveals **every** element, or limitation, of a claimed invention. Furthermore, the limitations that must be met by an anticipatory reference are those set forth in each statement of function in a claims limitations, and such a limitation cannot be met by an element in a reference that performs a different function, even though it may be part of a device embodying the same general overall concept. Cohen fails to teach each limitation of the rejected claims and, therefore, the Applicants traverse the rejection of each of those claims as being anticipated.

Claim 1 recites:

1. An apparatus for requesting a server to provide a service to an application, comprising:
  - an input for receiving from the application a service request including first information which directs a server to route to the application a data stream associated with a service; and
  - an information transformer coupled to said input for transforming said first information in said service request into second information which directs the server to route the data stream to a proxy which is installed in a communication path from the server to the application and which is operable for performing a proxy operation on the data stream. (emphasis added).

Claim 1 is directed to an apparatus which receives a service request from an application to order a server to send a data stream associated with the service. An information transformer transforms information in the service request in order to direct the server to route the data stream to a proxy in a communication path between the server and application. The data stream is operated on by a proxy function, whereby the data stream is treated by the proxy before the data stream reaches the application.

According to the teachings of Cohen, a proxy redirector manipulates a request to be sent to a proxy cache instead of to the origin server as determined by a DNS server. This redirection, which is a redirection of the request for an object, is used to find

another storage of the proxy functionality that is requested. In contrast, Applicant's invention is characterized by an information transformer that manipulates information contained in the request. The request is still transmitted to the server that hosts the desired object; i.e., the request is not redirected. The server then responds to the request by sending the requested datastream. The datastream, however, is not returned directly to the application that requested it; rather, the datastream is transmitted to a proxy which is operable to perform a proxy operation on the datastream before forwarding the datastream to the requesting application. Thus, according to Applicants' invention, the redirection is performed on the requested datastream and not on the request. In other words, there is a difference between manipulating the address of the request (Cohen) and manipulating the content of the request indicating where to send a response to the request (Applicants' invention). Thus, Cohen fails to anticipate claim 1.

Whereas claim 12 includes limitations analogous to those of claim 1, Cohen also fails to anticipate that claim. Whereas claims 4-6 and 8- 11 are dependent from claim 1 and claims 15-17 and 19-22 are dependent from claim 12, and include the limitations of their respective base claims, those claims are also not anticipated by Cohen.

## **2.) Claim Rejections – 35 U.S.C. §103(a)**

The Examiner rejected claims 2-3 and 13-14 as being unpatentable over Cohen in view of Gupta, *et al.* (US 6,567,857 B1); and claims 7 and 18 as being unpatentable over Cohen in view of Earl, *et al.* (US 6,112,228). The Applicants traverse the rejections.

Claims 1 and 12 have been shown, *supra*, to be patentable over Cohen. Gupta and Earl fail to cure the deficiencies of Cohen and, therefore, claims 1 and 12 are also patentable over Cohen in view of Gupta or Earl. Therefore, whereas claims 2-3 and 7 are dependent from claim 1 and claims 13-14 and 18 are dependent from claim 12, and include the limitations of their respective base claims, those claims are also patentable over Cohen in view of Gupta or Earl.


\* \* \*

### **CONCLUSION**

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-22.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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